

Crane M. Pomerantz, Esq.
Nevada Bar No.: 14103
SKLAR WILLIAMS PLLC
410 South Rampart Boulevard, Suite 350
Las Vegas, Nevada 89145
Telephone: (702) 360-6000
Facsimile: (702) 360-0000
Email: cpomerantz@sklar-law.com

Attorneys for Defendant John Telusma

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

United States,

Plaintiff,

V.

[16] John Telusma,

Defendant.

CASE NO.: 2:17-cr-306-JCM-PAL

**Stipulation for Extension of Time to File the
Reply in Support of Defendant's Motion to
Suppress (ECF No. 475)**

(First Request)

The Defendant John Telusma, by and through undersigned counsel, and the United States, by and through undersigned counsel, respectfully submit this stipulation in support of additional time within which the Defendant may file his reply in support of his Motion to Suppress Evidence. ECF No. 475. In support of this stipulation, the parties state:

1. On January 30, 2018, a grand jury in the District of Nevada returned the Second Superseding Indictment (“the Indictment”) against the Defendant and thirty-five others. ECF No. 303. The Indictment charged the Defendant with Racketeering Conspiracy, in violation of 18 U.S.C. § 1962(d), alleging that the Defendant conspired to participate in the conduct of the affairs of the Infraud Organization through a pattern of racketeering activity.

2. On June 7, 2018, the Court designated the above-captioned case as complex and adopted the Complex Case Schedule and Case Management Order. ECF No. 405. The Court set February 1, 2019, as the deadline for filing all pretrial motions and notices required by Rule 12 of the Federal Rules of Criminal Procedure, and March 4, 2019, as the deadline for filing responses to such motions. *Id.* at 12.

3. On December 11, 2018, due to delays in processing the voluminous discovery in this case, the Court granted defense counsel's request for a thirty-day extension of the Pretrial Motions Deadline for all motions, other than motions challenging the Indictment and certain motions to suppress. For those motions, the deadline remained February 1, 2019. ECF No. 448.

4. On February 1, 2019, the Defendant timely filed a Motion to Suppress Evidence.

5. The parties agreed to, and, on February 22, 2019, the Court granted, a stipulation to continue the Government's response date to the Defendant's Motion to Suppress Evidence for 21 days. ECF No. 499. The parties' stipulation did not address the time for the Defendant to file his reply.

6. The Government timely filed its opposition on March 22, 2019. ECF No. 515. The Defendant's reply would be due on March 29, 2019. Due a number of unavoidable scheduling conflicts and overall workload, counsel for the Defendant seeks an extra week, until April 5, 2019, to file a reply in support of Defendant's Motion to Suppress Evidence.

7. This proposed extension does not require an extension of the time within which the case must be tried under the Speedy Trial Act, 18 U.S.C. § 3161.

DATED this 27th day of March, 2019.

Respectfully submitted,

Agreed:

DAVID L. JAFFE
Organized Crime and Gang Section

Crane M. Pomerantz, Esq.
Counsel for Defendant Telusma

Kelly Pearson
Chad W. McHenry

ORDER

Upon stipulation of the parties and good cause appearing,

IT IS SO ORDERED.

April 5, 2019

The Defendant shall have until _____ to file a reply in support of his Motion to Suppress Evidence, ECF No. 475.

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Hon. Peggy A. Leen

United States Magistrate Judge

April 1, 2019